

SEALEDUNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

CRIMINAL NO. 18- 10237

v.)

Violations:

Juan PEGUERO,)

18 U.S.C. § 1956(a)(1) –

Defendant.)

Laundering of Monetary Instruments

18 U.S.C. § 982(a)(1) –

Money Laundering

Forfeiture Allegation

INDICTMENT**COUNT ONE: (Title 18, United States Code, Section 1956(a)(1)(B)(i) – Laundering of Monetary Instruments; Title 18, United States Code, Section 2 – Aiding and Abetting)**

The Grand Jury charges that:

On or about April 10, 2015, in Boston, elsewhere in the District of Massachusetts, and elsewhere,

JUAN PEGUERO,

defendant herein, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, specifically the transfer of United States currency in the approximate amount of \$398,820, which in fact involved the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT TWO: (Title 18, United States Code, Section 1956(a)(1)(B)(i) – Laundering of Monetary Instruments; Title 18, United States Code, Section 2 – Aiding and Abetting)

The Grand Jury charges that:

On or about June 18, 2015, in Revere, elsewhere in the District of Massachusetts, and elsewhere,

JUAN PEGUERO,

defendant herein, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, specifically the transfer of United States currency in the approximate amount of \$90,000, which in fact involved the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

MONEY LAUNDERING FORFEITURE ALLEGATION
(Title 18, United States Code, Section 982(a)(1))

The Grand Jury further finds that:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 1956, set forth in Counts One and Two of this Indictment,

JUAN PEGUERO

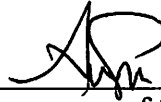
defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. A sum of money equal to the total amount of money involved in the offense, which may be entered in the form of a forfeiture money judgment.
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendant --
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

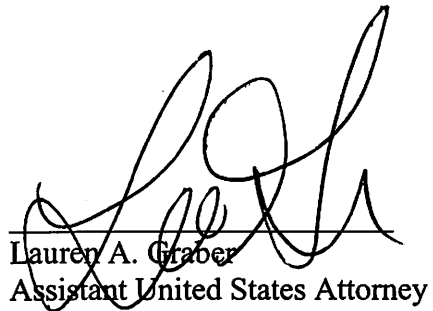
it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL

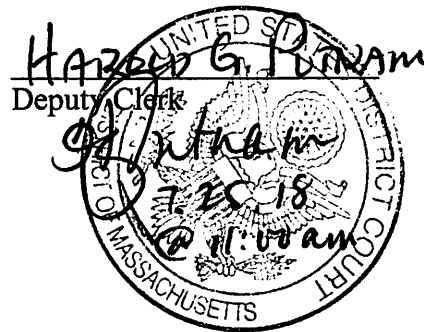


Foreperson of the Grand Jury



Lauren A. Graber
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS July 25, 2018
Returned into the District Court by the Grand Jurors and filed.



HAROLD G. PETERSON
Deputy Clerk
7.25.18
@ 11:00 am